

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

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Mail Processing Network Rationalization  
Service Changes, 2012

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Docket No. N2012-1

AMERICAN POSTAL WORKERS UNION, AFL-CIO,  
MOTION FOR ADDITIONAL ACCESS TO  
NON-PUBLIC INFORMATION IDENTIFIED  
AS USPS-LR-N2012-1/ NP19  
(March 19, 2012)

Earlier today, March 19, 2012, American Postal Workers Union, AFL-CIO (APWU), filed a Motion for Access to Non-Public Information Identified as USPS-LR-N2012-1/NP19. Accompanying this Motion was the signed certifications of APWU representatives, and consultants, however APWU attorneys were unable to complete the necessary certification in time for the filing (which was originally filed on Friday March 19, 2012, but an error prevented it from being docketed until today). A certification for USPS-LR-N2012-1/NP19 for the following attorneys has now been completed:

Darryl J. Anderson, Esq.  
O'Donnell, Schwartz & Anderson, PC  
Counsel for the American Postal Workers Union, AFL-CIO

Jennifer L. Wood, Esq.  
O'Donnell, Schwartz & Anderson, PC  
Counsel for the American Postal Workers Union, AFL-CIO

A copy of the Certification is attached hereto.

For the reasons stated in our earlier Motion for Access, APWU respectfully requests that the above named individual be granted immediate access to the non-public Library Reference USPS-LR-N2012/1NP19.

Persons identified by the Postal Service pursuant to Section 3007.2(c) have been provided with a copy of this Motion and accompanying certification today by email.

**Conclusion**

For the forgoing reasons and the reasons stated in APWU's Motion for Access, filed March 19, 2012 APWU respectfully requests that access to Library Reference USPS-LR-N2012-1/NP19 granted to the above named individuals.


Respectfully submitted,

Jennifer L. Wood  
Counsel for American Postal Workers Union, AFL-CIO

### CERTIFICATION

The undersigned represents that:


Access to these materials provided in the matter identified as **USPS-LR-N2012-1/NP19** by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as **PRC Docket No. N2012-1**. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name	Darryl J. Anderson
Firm	O'Donnell, Schwartz & Anderson, P.C.
Title	Attorney
Representing	APWU
Signature	
Date	3/19/12

### CERTIFICATION

The undersigned represents that:

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Name	<u>Jennifer L. Wood</u>
Firm	<u>O'Donnell, Schwartz &amp; Anderson, P.C.</u>
Title	<u>Attorney</u>
Representing	<u>APWU</u>
Signature	<u></u>
Date	<u>March 19, 2012</u>